

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

AT _____

FILED

JUN 24 2022

Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

Nicole Williams)

_____)

_____)

_____)

_____)

Name of plaintiff (s))

v.)

_____)

_____)

_____)

_____)

_____)

_____)

_____)

Name of defendant (s))

Case No. 1:22-cv-168 Pollier/
(to be assigned by Clerk)

Lee

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Title VII, I was paid less wages because
of my race.

2. Plaintiff, Nicole Williams, resides at

888 Bortside Place, Chattanooga
street address city

Hamilton, TN, 37402, 704-689-0479.
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

3. Defendant, K-Va-1 Food Stores/KadCity lives at, or its business is located at
3901 Dayton Blvd, Bed Bank,
street address city
Hamilton, IN, 37415.
county state zip code

(if more than one defendant, provide the same information for each defendant below)

4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

EEOC charge No 490-2021-02226 issued
by US EEOC a right to sue on 5/20/22.

5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. Back pay for 1 year that the EEOC allows
- b. plus the 8 months period from actually
- c. filing a complaint until employment departure.
- d. The 20 month period is equal to 2107.50 hrs.
- e. The pay difference is \$6.79 per hour = \$14,309.95
- f. I would also like additional monies
- g. for pain and suffering.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 24th day of June, 2022.

Dr. Dele Williams

Signature of plaintiff (s)